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DOC #:
DATE FILED: 5/9/13

MEMO ENDORSED

U.S. Department of Justice

United States Attorney
Southern District of New York

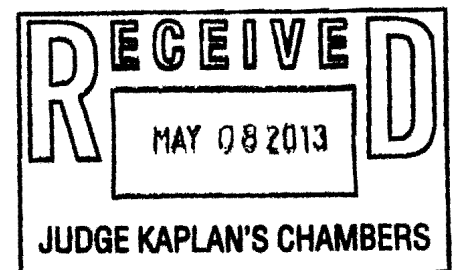
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 8, 2013

By Hand

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Sulaiman Abu Ghayth
S13 98 Cr. 1023 (LAK)



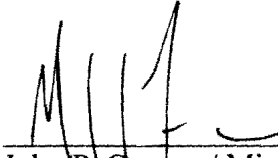
Dear Judge Kaplan:

The Government respectfully writes to propose that the Government's anticipated motion pursuant to Section 4 of the Classified Information Procedures Act be filed by July 15, 2013. The undersigned have conducted a review of those potentially relevant, classified materials that have been received in response to requests made to other components of the United States Government for materials in their possession. In light of that review, we anticipate making a motion pursuant to Section 4, and propose a July 15 filing date to allow sufficient time for the relevant components of the Government to obtain the necessary approvals and declarations for the filing. I have spoken to Philip L. Weinstein, Esq., counsel for the defendant, and the defense consents to this proposed schedule.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:


John P. Cronan / Michael Ferrara
Assistant United States Attorneys
Tels.: (212) 637-2779 / -2526

SO ORDERED

cc: Philip L. Weinstein, Esq.,
LEWIS A. KAPLAN, USDC
Martin Conell, Esq.
Jonathan Marvinny, Esq.
By electronic mail

5/8/13

The motion shall
be filed by
6/30/13